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10  
11 UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF NEW YORK

13 ===== :  
14 JUSTIN LANASA, TSR, LLC, and :  
15 DUNGEON HOBBY SHOP MUSEUM, LLC, : Case No. 22-cv-5686-KAM-VMS

16 :  
17 Plaintiffs, :  
18 : AMENDED

19 — *versus* — : VERIFIED COMPLAINT

20 :  
21 ERIK STIENE, ~~and LOIS STIENE, aka~~ RACHEL :  
22 STIENE, :

23 Jointly and Severally, :  
24 :

25 Defendants. :  
26 ===== :

27 The Plaintiffs, JUSTIN LANASA, TSR, LLC, and DUNGEON HOBBY  
28 SHOP MUSEUM, LLC, by and through their attorney of record,  
29 Bernard V. Kleinman, Esq., for their Amended Verified  
30 Complaint against the named Defendants, do hereby allege the  
31 following,

32 THE PARTIES

33 1. Plaintiff JUSTIN LANASA (hereinafter referred to as  
34 "LANASA") is a resident of the State of North Carolina,  
35 residing in the County of New Hanover, City of Wilmington.

1           2. Plaintiff TSR, LLC (hereinafter referred to as "TSR")  
2 is a limited liability corporation existing under the laws of  
3 the State of Wisconsin. TSR maintains and conducts business  
4 from an office in Wilmington, North Carolina. The sole Member  
5 is Plaintiff LANASA.

6           3. Plaintiff DUNGEON HOBBY SHOP MUSEUM, LLC (hereinafter  
7 referred to as "DUNGEON HOBBY"), is a limited liability  
8 corporation existing under the laws of the State of Wisconsin  
9 and operates as a business in the State of Wisconsin. The  
10 sole Member is Plaintiff LANASA.

11           4. Plaintiff LANASA is the principal officer and member  
12 of Plaintiffs TSR and DUNGEON HOBBY.

13           5. Defendant ERIK STIENE (hereinafter referred to as "E.  
14 STIENE") is a private individual residing at 5209 Haspel  
15 Street, # 2, Elmhurst, NY 11373-4344.

16           6. Defendant ~~LOIS~~ STIENE (hereinafter referred to as "~~L.~~  
17 STIENE") is a private individual residing at 5209 Haspel  
18 Street, # 2, Elmhurst, NY 11373-4344.

19           7. Upon information and belief, Defendants ERIK STIENE  
20 and ~~LOIS~~ STIENE, are married to one another.

21           8. Plaintiff TSR is a limited liability company and a  
22 creator, manufacturer, and distributor of tabletop role  
23 playing games, as well as other products and services.

1 Plaintiff distributes its products throughout the country and  
2 on the internet.

3 **JURISDICTION & VENUE**

4 9. Plaintiffs repeat and re-iterate ¶¶ 1 through 8  
5 inclusive as if set forth herein.

6 10. Each and all acts of Defendants E. STIENE and ~~L.~~  
7 STIENE were performed individually and collectively, and by  
8 their own respective design and intent as set forth *infra*.

9 11. The incidents which give rise to this cause of action  
10 occurred within this jurisdiction, the Eastern District of  
11 New York, and within one year of the action itself or within  
12 one year of the named Plaintiffs having discovered the  
13 publication of the alleged defamatory statements, and other  
14 tortious conduct.

15 12. In addition, thereto, such acts of tortious conduct  
16 occurred well before the dates of statutory mandate, and  
17 continue through this date, demonstrating the requisite  
18 malice and aforethought to establish an intent to harm the  
19 named Plaintiffs.

20 13. Venue is proper in this Court pursuant to 28 U.S.C.  
21 § 1391(b)(1), (2), (c)(2) as amended by Section 311 of the  
22 Judicial Improvement Act of 1990, by reason of it being the  
23 location where all, or substantially all, of the events or

1 omissions giving rise to the claims occurred, and where the  
2 Defendants reside.

3 14. Jurisdiction is proper pursuant to federal diversity  
4 jurisdiction and the amount of damages is in excess of the  
5 jurisdictional amount laid out therein, viz., 28 U.S.C. §  
6 1332. Plaintiffs further invoke the pendent and supplemental  
7 jurisdiction of this Court to hear and decide claims arising  
8 under state law pursuant to 28 U.S.C. § 1367.

9 **ALLEGATIONS**

10 15. Plaintiffs repeat and re-iterate ¶¶ 1 through 14 as  
11 if set forth herein.

12 16. Defendants, both jointly, and individually, maintain  
13 and actively participate in an online presence designated as  
14 "Tenkar's Tavern".

15 17. This online presence, designated as "Tenkar's  
16 Tavern", is almost solely and exclusively devoted to an  
17 obsession with the named Plaintiffs, and includes weekly, if  
18 not daily, diatribes, insults, threats, false statements, and  
19 profane language directed at the named Plaintiffs, and other  
20 postings and re-postings designed to harass, annoy and aggra-  
21 vate the named Plaintiffs, causing them both personal and  
22 professional financial and other harm.

1           18. Upon information and belief, the Defendant E. STIENE  
2 maintains this sight as a commercial site, selling subscrip-  
3 tions and products through Amazon® (see  
4 [https://www.amazon.com/stores/page/9D7E0086-7547-4726-B258-](https://www.amazon.com/stores/page/9D7E0086-7547-4726-B258-E086D36914C3/r/ref=as_li_ss_tl?ie=UTF8&linkCode=sl2&tag=tenkstav-20&linkId=e9bflf6a2d0efff40078ff9d99f64282&language=en_US)  
5 [E086D36914C3/r/ref=as\\_li\\_ss\\_tl?ie=UTF8&linkCode=sl2&tag=ten](https://www.amazon.com/stores/page/9D7E0086-7547-4726-B258-E086D36914C3/r/ref=as_li_ss_tl?ie=UTF8&linkCode=sl2&tag=tenkstav-20&linkId=e9bflf6a2d0efff40078ff9d99f64282&language=en_US)  
6 [kstav-20&linkId=e9bflf6a2d0efff40078ff9d99f64282&](https://www.amazon.com/stores/page/9D7E0086-7547-4726-B258-E086D36914C3/r/ref=as_li_ss_tl?ie=UTF8&linkCode=sl2&tag=tenkstav-20&linkId=e9bflf6a2d0efff40078ff9d99f64282&language=en_US)  
7 [language=en\\_US](https://www.amazon.com/stores/page/9D7E0086-7547-4726-B258-E086D36914C3/r/ref=as_li_ss_tl?ie=UTF8&linkCode=sl2&tag=tenkstav-20&linkId=e9bflf6a2d0efff40078ff9d99f64282&language=en_US)) among other Internet sites.

8           19. Such tortious conduct has occurred on innumerable  
9 occasions, without letup in an obsessive and compulsive  
10 manner, and can be demonstrated by multiple Youtube® videos.  
11 On an all but daily basis the Defendant E. STIENE, in an  
12 obsessive, compulsive and fixated manner posted scurrilous  
13 and false statements about the named Plaintiffs. These  
14 postings, numbering in the scores, demonstrate, merely based  
15 upon their frequency, a malice and intent designed to harm  
16 the Plaintiffs.

17           20. The Defendant were, however, not satisfied with  
18 merely posting on Youtube®, but the named Defendants have  
19 utilized multiple other locations on the Internet to  
20 distribute and publish their defamatory and libelous state-  
21 ments; all demonstrating the malice and intent to harm the  
22 named Plaintiffs. These locations include, but are not  
23 limited to,

1           <https://www.tenkarstavern.com/>  
2           <https://www.facebook.com/tenkarstaverncommunity/>  
3           <https://www.patreon.com/tenkarstavern>  
4           <https://discord.me/tenkars-tavern>  
5           <https://twitter.com/tenkarstavern?lang=en>  
6           <https://podcasts.apple.com/us/podcast/tavern->  
7           [chat/id1386740882](https://podcasts.apple.com/us/podcast/tavern-)  
8           <https://anchor.fm/tavernchat>

9           21. Through this online presence Defendants, knowingly  
10          and willfully, with the intent to harm and cause financial  
11          damage to the Plaintiffs, as set forth below, have made  
12          fraudulent and defamatory statements specifically accusing  
13          the named Plaintiffs of various scurrilous and damaging  
14          behavior, as set forth in detail below, all actionable under  
15          the New York tort law.

16          22. Among, but not limited to, the knowingly, malicious,  
17          and intentional and false and defamatory statements, and  
18          other tortious conduct, published online by the Defendants  
19          were the following:

20               **January 08, 2022:**

21               In accusing Plaintiff LANASA of dishonesty, E. STIENE  
22               (and L. STIENE @ 07:58) stated that Plaintiff LANASA was  
23               "inadvertently honest, I don't think that was your  
24               intention" 04:57 Emphasis added.  
25

1 Accusing Plaintiff LANASA of not paying his employees  
2 and hires:  
3 "the new artist got paid for it, but Greg Bell did not"  
4 07:05 Emphasis added.

5  
6 <https://www.youtube.com/watch?v=wDl3Wo6WTuU>  
7

8 **January 09, 2022:**

9 E. STIENE knowingly mis-represented the Plaintiff  
10 DUNGEON HOBBY, having the purpose of accepting gamers  
11 donations:

12 "wasn't a not for profit, was for profit" 03:16

13 <https://www.youtube.com/watch?v=AbpJ-djtNk0>  
14

15 **February 08, 2022:**

16 E. STIENE, in an attempt to alienate prospective  
17 customers, and financially damage the Plaintiffs,  
18 made repeated postings on the internet that stated  
19 that the Plaintiff LANASA:

20 "does not like homos and their type; will not work  
21 with folks that support them" 12:29  
22

23 <https://www.youtube.com/watch?v=ZJDAAtBlR6vc>  
24

25 **February 08, 2022:**

26 E. STIENE, in an attempt to alienate prospective  
27 customers, and cause financial harm to Plaintiffs  
28 TSR and DUNGEON HOBBY, including trade libel, made  
29 repeated postings on the internet that stated the  
30 following false statements as to Plaintiff LANASA:  
31 "he thinks he's some kind of warrior for the old  
32 ways; you know racism, gay bashing, women in the  
33 kitchen" 12:29  
34

35 <https://www.youtube.com/watch?v=ZJDAAtBlR6vc>  
36

37 **February 18, 2022:**

38 E. STIENE, as a *prima facie* tort, threatening the  
39 Plaintiff with physical violence:

40 "jackass comes to my house; I hope they like lead  
41 because I have plenty to offer if that is the case"  
42 01:51  
43

44 <https://www.youtube.com/watch?v=hxsD0lDPkDc>  
45

**March 17, 2022:**

E. STEINE asserting Plaintiff LANASA of engaging in violent sexual conduct demonstrating actionable malice on Defendant E. STEINE's part:

"Mario77 [a name that the Defendant ascribed to Plaintiff LANASA], aka ignorant cunt, aka Justin I fuck ignorant cocks; we know this is Justin" 0:28

Accusing Plaintiff LANASA of doxing, searching for and publish private or identifying information about a particular individual on the internet, with malicious intent to harm the Plaintiff, as *prima facie* tort:

"You doxed me, you little shit." 03:09

The "title" of this Internet Youtube® posting being:

"Justin is Trying to dox My Wife Rachel - Go F' Yourself LaNasa!"

~~E. STEINE alleging Plaintiff LANASA of being a convicted criminal, with no support:~~

~~"your criminal history; that's certainly public knowledge" 06:10~~

E. STEINE and E. STEINE making violent sexual misconduct statements as to the Plaintiff LANASA, as *prima facie* tort:

"my wife just told you that she would grow a cock so you could eat that cock" 09:31

<https://www.youtube.com/watch?v=pSbVzLby37w>

**May 10, 2022:**

E. STEINE intentionally describing Plaintiff TSR's customers in a defamatory and scurrilous manner as to cause financial harm to the named Plaintiff:

"TSR . . . they are scraping the bottom of the privy, okay, you can't get more shit than this shit. So that's your customer base and you're appealing to it." 04:10 - 04:22

<https://www.youtube.com/watch?v=YtFIIqhJQRA>

**May 28, 2022:**

1 E. STIENE making knowingly false statements about  
2 the Plaintiff LANASA's military service:  
3 "he himself was kicked out of the military for lack  
4 of leadership potential" 15:09

5  
6 <https://www.youtube.com/watch?v=qkpDy7DJhKw>

7  
8 **June 15, 2022:**

9 E. STIENE knowingly falsely describing Plaintiff  
10 LANASA's business practices with an intent to cause  
11 financial harm to Plaintiffs, both as to customers  
12 and potential investors:  
13 "you fucked over your prior business partners to  
14 get the TSR trademark" 05:23

15  
16 E. STIENE knowing the statement to be a false trade  
17 libel, alleged association of the Plaintiff with "a  
18 Nazi":

19 "you included a Nazi in the company" 09:19

20  
21 <https://www.youtube.com/watch?v=djYL3joFZqQ>

22  
23 **Dec. 17, 2022:**

24 <https://www.youtube.com/watch?v=-J8Du-fjbpo>

25 @ 0:57.00, Defendant ~~L.~~ STIENE referring to Plaintiff as  
26 an on-line entity which he is not

27  
28 **Nov. 27, 2022:**

29 <https://www.youtube.com/watch?v=7SsZPY7qqMk>

30 ~~L.~~ STIENE and E. STIENE making clear that Plaintiff has  
31 used anonymous emails. 0:30:10 thru 0:47.10

32 ~~L.~~ STIENE and E. STIENE accusing the Plaintiff of  
33 Substance abuse:

34 Describing the Plaintiff, in clear terms as sending  
35 anonymous emails on the weekend, because that is the  
36 "time to get into a bottle of Jack" 0:59:15 - 1:02:00

37 23. Further, in an attempt to intimidate, harass, and  
38 threaten, causing fear and emotional distress, the Defendant  
39 E. STIENE engaging in *prima facie* tort, posted a video in

1 which he stated: "I already know your address; I already know  
2 your fucking phone number; I know your wife's phone number."

3 **March 17, 2022:** <https://www.youtube.com/watch?v=pSbVzLby37w>  
4 @ 05:26

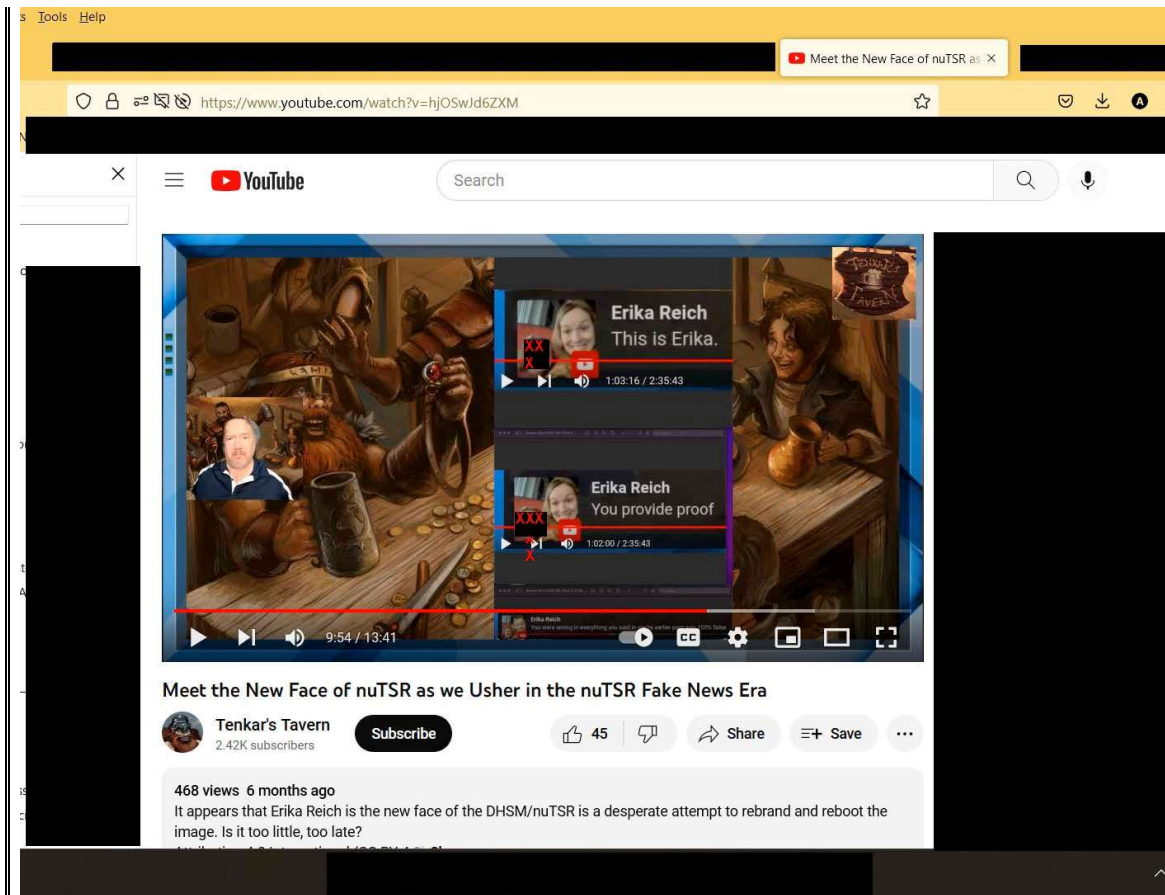
5 24. After Defendant posted this on Youtube®  
6 (<https://youtu.be/-sDfkispM9w>), Geek Nation® canceled a tour  
7 with the Plaintiffs, causing financial damages in payments to  
8 the Plaintiffs TSR and DUNGEON HOBBY, and attacking any one  
9 that supports said Plaintiffs.

10 25. The Defendant also posted, online, in a continuing  
11 attempt to intimidate, harass, and threaten the Plaintiff  
12 LANASA, engaging in *prima facie* tort, images of LANASA's wife  
13 and minor child, without prior authorization or permission,  
14 in violation of N.Y. Civil Rights L. §§ 50, 51. While the  
15 posting spoke about the Plaintiff LANASA's spouse, the  
16 Defendant E. STIENE, chose to post images of the Plaintiff  
17 LANASA's minor child.

18 26. This was further exacerbated by the fact that  
19 Defendant E. STIENE made no attempt to blur or otherwise  
20 distort the image of the minor child. See<sup>1</sup>

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<sup>1</sup> It should be noted that the image actually posted by the Defendant is a clear and identifiable image of Plaintiff LANASA's minor child. It has been redacted out here, to avoid any further posting of said image.



1  
2 This posting lasted the entire length of the Youtube® video,  
3 for more than thirteen minutes, and included such statements  
4 as:

5 "Erika is the new face of TSR", 5:17

6 **June 18, 2022:** <https://www.youtube.com/watch?v=hjOSwJd6ZXM>

7 27. This purposeful and intentional posting of the  
8 Plaintiff's minor child is a direct and knowing violation of  
9 the Terms of Service of Google and Youtube®. According to  
10 said Terms of Service:

11 Anyone posting content with minors must do the  
12 following:

- **Respect privacy.** Secure consent from the minor's parent or legal guardian before featuring them in your video. Make sure their participation in your video is voluntary.

See

<https://support.google.com/youtube/answer/9229229?hl=en>

It, furthermore, is a direct violation of Google's Community Guidelines. *Ibid.*

28. At all times relevant hereto, the Defendants, both individually, and collectively, knew, or should have known, that the above stated actions were frivolous, outrageous and hurtful, including, but not limited to, accusations of criminal conduct, affiliation with Nazis, posting photographs of the Plaintiff's minor child, threatening the Plaintiff with physical harm, and could easily cause emotional and psychological trauma to the named targets, *i.e.*, the Plaintiffs.

29. The scandalous and salacious details in the published statements of the Defendants are complete fabrications and any reasonable investigation by Defendants would have and should have led to that conclusion. Accordingly, the false statements contained in the posted on-line statements are not protected or recognized by any judicial or litigation privilege.

1           30. The use of the Internet is particularly devastating  
2 due to its instantaneous ability to spread false and malicious  
3 statements such as those made by the Defendants. Indeed, as  
4 one Court has succinctly put it, "Online commentary is just  
5 as capable as print or broadcast media of inflicting the kinds  
6 of harm the defamation laws are designed to protect against.  
7 Indeed, online communications can spread more quickly, and to  
8 all corners of the world, than can print or broadcast media  
9 statements." *Eros Int'l PLC v. Mangrove Partners*, 2019 N.Y.  
10 Slip Op. 30604(U) at p. 17 (S. Ct. N.Y. Co. Mar. 8, 2019),  
11 *aff'd* 191 A.D.3d 465 (1<sup>st</sup> Dep't 2021).

12           31. Private social media platform companies such as  
13 Facebook®, Twitter®, Youtube®, and Instagram® were founded  
14 and gained rapid popularity in the early 2000s. While each  
15 platform has a slightly different target audience and  
16 strategic objectives, the basic user experience is the same:  
17 users can either publicly post (a message, photo, or video)  
18 to their followers or privately send a direct message to other  
19 users of that social media platform. Thus, the era of private  
20 companies operating mass communication social networks began.  
21 Many eyes shifted from the front pages of curated, edited,  
22 and source-checked newspapers to these unregulated social  
23 media platforms. These social media platforms provide certain

1 well-known communication benefits to individuals, businesses,  
2 and society as a whole. But these social media platforms also  
3 allow wrongdoers like the STIENEs to make false, defamatory,  
4 and/or harassing statements to single-handedly designed to  
5 destroy a person's reputation and the reputation and com-  
6 mercial viability of carefully built businesses.

7 32. The emotional trauma caused by the actions of the  
8 Defendants was further demonstrated by what can only be  
9 described as a concerted campaign of repeatedly posting  
10 false, damaging and threatening statements on the Internet  
11 directed at the Plaintiffs. See ¶¶ 17 thru 20, *supra*.

12 33. In an attempt to resolve this behavior without the  
13 necessity of judicial intervention, the Plaintiffs had  
14 counsel send a Cease and Desist Letter to the Defendant E.  
15 STIENE on July 29, 2022. See Exhibit A.

16 34. In a further example of the Defendant's rank and  
17 tortious behavior, and clear malicious intent to continue to  
18 harm the Plaintiffs, the response of the Defendant was to  
19 post the letter online, and ridicule it; with no actions taken  
20 to comply with the letter. This posted response alleged that  
21 the Cease and Desist Letter was an attempt to "Intimidate  
22 Witnesses", in ongoing litigation unrelated to this action:

1 "Was My C&D Letter From LaNasa TSR an Attempt to ID &  
2 Intimidate Witnesses in the WotC Legal Action?"

3  
4 See <https://www.youtube.com/watch?v=A6B-LmnEedwXX>, Aug. 30,  
5 2022.

6 35. In further attempts to harass, intimidate, and  
7 threaten the named Plaintiffs, the Defendant E. STIENE has  
8 made repeated, unsubstantiated, and uncorroborated statements  
9 alleging some former position in law enforcement specifically  
10 alleging the following:

11 "It was my job when I was an investigator in internal  
12 affairs"

13 See, e.g., **September 6, 2021:**

14 <https://www.youtube.com/watch?v=JKWf-tBI1Hg> @ 11:56.

15 36. As a direct and indirect result of the Defendants'  
16 actions, the Plaintiffs both individually and collectively  
17 have suffered damages in the form of litigation and trial  
18 expenses, and loss of income, and damages as set forth herein.

19 **CAUSE OF ACTION FIRST**

20 **AS AGAINST DEFENDANTS — DEFAMATION & LIBEL**

21 37. Plaintiffs repeat, re-iterate, and incorporate  
22 herein ¶¶ 1 through 36 as if set forth herein.

23 38. The above-stated defamatory and libelous statements  
24 as set forth in ¶ 22 described above have had a devastating

1 and irreparable effect on the Plaintiffs personal and  
2 professional reputations.

3 39. Furthermore, upon information and belief, said  
4 defamatory statements have been repeated and re-posted by  
5 third parties causing further and lasting harm to the named  
6 Plaintiffs. See ¶ 44.

7 40. The Defendant either published, or cause to be  
8 published, numerous false and defamatory statements about the  
9 Plaintiffs. These include claims of association and  
10 sympathies with Nazis and white supremacists, ~~a criminal~~  
11 ~~conviction~~, anti-homosexual conduct, failure to pay debts,  
12 and other statements as laid out above.

13 41. Each of these aforesaid defamatory statements were  
14 untrue and defamatory in that they falsely reported and  
15 mischaracterized the Plaintiffs' character and actions, and  
16 the Defendants knew, or should have known, that such  
17 statements were false.

18 42. The Defendants published these false and defamatory  
19 statements with malice.

20 43. The Defendant published these false and defamatory  
21 statements with knowledge of their falsity and/or with a  
22 reckless disregard for the truth or falsity of these state-  
23 ments.

1           44. Without regard to the falsity and defamatory nature  
2 of these statements, among others, the Defendants (in an  
3 attempt to make the named Plaintiffs into some kind of public  
4 persona) allowed and encouraged other parties to re-publish  
5 these statements, causing further harm to the Plaintiffs.

6 See, e.g.,

7           <https://youtu.be/KRDUFHbV8N4> (July 20, 2022)

8           <https://youtu.be/AKPn7fM1YwA> (July 20, 2022)

9           <https://youtu.be/wtlHA2O3GYs> (July 20, 2022)

10           <https://youtu.be/ibqG4AlcyNk> (July 25, 2022)

11           <https://youtu.be/rkPURc5cqTU> (July 21, 2022)

12           <https://youtu.be/OUjK132rx-Y> (July 27, 2022)

13           <https://youtu.be/KRDUFHbV8N4> (July 20, 2022)

14           [https://www.tiktok.com/@nightshade\\_386/video/712263332](https://www.tiktok.com/@nightshade_386/video/7122633321754037550?is_from_webapp=vl&item_id=7122633321754037550)  
15           [1754037550?is\\_from\\_webapp=vl&item\\_id=71226333217540375](https://www.tiktok.com/@nightshade_386/video/7122633321754037550?is_from_webapp=vl&item_id=7122633321754037550)  
16           [50](https://www.tiktok.com/@nightshade_386/video/7122633321754037550?is_from_webapp=vl&item_id=7122633321754037550)

17  
18           45. The Defendants, among other things, as set forth  
19 above, accused the Plaintiff LANASA of “he’s some kind of  
20 warrior for the old ways; you know racism, gay bashing, women  
21 in the kitchen”; “you included a Nazi in the company”; “you  
22 fucked over your prior business partners to get the TSR  
23 trademark”; having a substance abuse problem. See ¶ 22 above.  
24 All of which the Defendant knew to be false.

1           46. The effect of these accusations has been to seriously  
2 and irrevocably harm not only Plaintiff LANASA, but also  
3 Plaintiffs TSR, and DUNGEON HOBBY. See ¶ 75.

4           47. These aforesaid statements constitute defamation  
5 and/or libel because they falsely impugn the Plaintiffs'  
6 honesty, trustworthiness, dependability, and professional  
7 fitness and abilities, and falsely charged him with engaging  
8 in criminal conduct, fraud, dishonesty and/or other conduct  
9 that would tend to injure the Plaintiffs in their trade or  
10 business, and any trade, business, or profession which  
11 Plaintiffs may seek to pursue.

12           48. These aforesaid false and defamatory statements have  
13 caused the Plaintiff LANASA (as well as his family members)  
14 severe embarrassment, humiliation and emotional injury.

15           49. Upon information and belief, the Defendants have  
16 made, and continue to make or cause to be made, these and  
17 similarly false and defamatory statements about the Plain-  
18 tiffs to third parties.

19           50. As a result of said defamation, the Plaintiff LANASA  
20 continues to suffer from severe humiliation, loss of standing  
21 in the community, loss of self-esteem, public disgrace, loss  
22 of standing and respect within his own family, and severe and  
23 extreme emotional distress.

1           51. The defamatory acts committed against the Plaintiffs  
2 by Defendants were intentional, willful, wanton, malicious  
3 and oppressive and were motivated, solely by a desire to  
4 permanently harm the name, reputation, and financial and  
5 business interests of the Plaintiffs without regard for the  
6 truth or the Plaintiffs' well-being and were based on a lack  
7 of concern and ill-will toward the Plaintiffs and/or a mali-  
8 cious, deliberate, and/or reckless disregard for their  
9 rights, for which the Plaintiffs are entitled to an award of  
10 punitive damages.

11           52. At all material times, Defendants defamed Plaintiff  
12 LANASA by – as stated above – making false statements which  
13 tended to expose Plaintiff to public contempt, ridicule,  
14 aversion or disgrace, and induced an evil opinion of him in  
15 the minds of right-thinking persons, and deprived him (and  
16 continues to deprive him) of their friendly intercourse in  
17 society.

18           53. The Plaintiff LANASA has suffered harm as a result  
19 of the defamatory statements including, but not limited to,  
20 reputational harm, emotional distress and mental anguish, and  
21 the statements were defamatory and libelous, and *per se* libel-  
22 ous.

1           54. As a direct and proximate result of the aforesaid  
2 actions of the Defendant, inclusive of all the claims herein,  
3 the Plaintiff LANASA and his family have been forced to seek  
4 therapy and other professional health care assistance.

5           55. As a result of Defendant's conduct, the Plaintiffs  
6 are entitled to compensatory (due to lost income, litigation  
7 expenses, and other costs directly associated with and  
8 attributable to Defendants' actions) and punitive damages, as  
9 well as injunctive and Declaratory relief.

10          56. That as a result of the foregoing, Plaintiffs have  
11 been damaged in a sum exceeding the jurisdictional limits of  
12 all lower courts that would otherwise have jurisdiction over  
13 this matter, in an amount of no less than \$1,000,000.

14                           **CAUSE OF ACTION SECOND**

15                           **AS AGAINST DEFENDANTS – SLANDER**

16          57. Plaintiffs repeat, re-iterate, and incorporate  
17 herein ¶¶ 1 through 56 as if set forth herein.

18          58. As set forth above, Defendant, on numerous  
19 occasions, with full knowledge that said statements were  
20 false and made with malice, did publish to third parties that  
21 Plaintiff LANASA, among other things, that Plaintiff LANASA  
22 was a "warrior for the old ways; you know racism, gay bashing,

1 women in the kitchen"; and "you included a Nazi in the  
2 company". See above, ¶ 22.

3 59. These aforesaid statements constitute defamation  
4 slander, and/or libel *per se* because they falsely impugn the  
5 Plain-tiffs' honesty, trustworthiness, dependability, and  
6 professional fitness and abilities, and falsely charged him  
7 with engaging in criminal conduct, fraud, dishonesty and/or  
8 other conduct that would tend to injure the Plaintiffs in  
9 their trade or business, and any trade, business, or  
10 profession which Plaintiffs may seek to pursue.

11 60. These aforesaid false and slanderous statements have  
12 caused the Plaintiff LANASA (as well as his family members)  
13 severe embarrassment, humiliation and emotional injury.

14 61. Upon information and belief, the Defendants have  
15 made, and continue to make or cause to be made, these and  
16 similarly false and defamatory statements about the  
17 Plaintiffs to third parties.

18 62. As a result of said slander, the Plaintiff continues  
19 to suffer from severe humiliation, loss of standing in the  
20 community, loss of self-esteem, public disgrace, loss of  
21 standing and respect within his own family, and severe and  
22 extreme emotional distress.

63. The slanderous acts committed against the Plaintiffs by Defendant were intentional, willful, wanton, malicious and oppressive and were motivated, solely by a desire to permanently harm the name, reputation, and financial and business interests of the Plaintiffs without regard for the truth or the Plaintiffs' well-being and were based on a lack of concern and ill-will toward the Plaintiffs and/or a malicious, deliberate, and/or reckless disregard for their rights, for which the Plaintiffs are entitled to an award of punitive damages.

64. At all material times, Defendants slandered Plaintiff LANASA by – as stated above – making false statements which tended to expose Plaintiffs to public contempt, ridicule, aversion or disgrace, and induced an evil opinion of him in the minds of right-thinking persons, and deprived him (and continues to deprive him) of their friendly intercourse in society.

65. The Plaintiff LANASA has suffered harm as a result of the defamatory statements including, but not limited to, reputational harm, emotional distress and mental anguish, financial losses, and the statements were slanderous, defamatory and libelous *per se*. See, e.g., ¶¶ 24, 75.

1           66. As a result of Defendant's conduct, the Plaintiffs  
2 are entitled to compensatory and punitive damages, as well as  
3 injunctive and Declaratory relief.

4           67. That as a result of the foregoing, Plaintiffs have  
5 been damaged in a sum exceeding the jurisdictional limits of  
6 all lower courts that would otherwise have juris-diction over  
7 this matter, in an amount of no less than \$1,000,000

8                           **CAUSE OF ACTION THIRD**

9                           **AS AGAINST DEFENDANTS –**

10                   **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

11           68. Plaintiff LANASA repeats, re-iterates, and  
12 incorporates herein ¶¶ 1 through 67 as if set forth herein.

13           69. The Defendants' conduct (as set forth herein) toward  
14 Plaintiff LANASA was so outrageous and shocking that it  
15 exceeded all reasonable bounds of decency as measured by what  
16 the average member of the community would tolerate and,  
17 second, that Defendants' conduct caused severe emotional  
18 distress to Plaintiff LANASA and, third, that Defendants  
19 clearly acted with the desire to cause such distress to  
20 Plaintiff LANASA; under circumstances known to any reasonable  
21 person which made it substantially certain that the result  
22 would follow; and, furthermore, as laid out herein (see, e.g.,  
23 ¶ 70), acted recklessly and with utter disregard of the

1 consequences that might follow, causing severe emotional  
2 distress to the named Plaintiff LANASA.

3 70. The Defendant also posted, online, in a continuing  
4 attempt to intimidate, harass, and threaten the Plaintiff,  
5 images of Plaintiff's wife and minor child. This posting  
6 lasted the entire length of the Youtube® video, for more than  
7 thirteen minutes. See ¶¶ 25 thru 27, *supra*.

8 **June 18, 2022:** <https://www.youtube.com/watch?v=hjOSwJd6ZXM>

9 71. The actions, as set forth above, were conducted by  
10 the Defendants for the sole and exclusive purpose of causing  
11 severe emotional distress; such actions of the Defendants,  
12 towards the Plaintiff were, and are, so shocking and  
13 outrageous that it exceeds all reasonable bounds of decency.

14 72. The Defendants' conduct toward Plaintiff, in posting  
15 not only the images of Plaintiff's spouse and minor female  
16 child, combined with threats of violence, and stating the  
17 Defendants knew where the Plaintiff resides (see ¶ 23), was  
18 so outrageous and shocking that it exceeded all reasonable  
19 bounds of decency as measured by what the average member of  
20 the community would tolerate and, secondly, the Defendants'  
21 conduct caused severe emotional distress to Plaintiff and his  
22 family, and, thirdly, that Defendant acted, solely and  
23 exclusively, with the desire to cause such distress to

1 Plaintiff, intentionally and recklessly and with utter  
2 disregard of the consequences that might follow.

3 73. For example:

4 **February 18, 2022:**

5 E. STIENE, as a *prima facie* tort, threatening the  
6 Plaintiff with physical violence:

7 "jackass comes to my house; I hope they like lead  
8 because I have plenty to offer if that is the case"  
9 01:51

10 <https://www.youtube.com/watch?v=hxsD01DPkDc>  
11

12 **March 17, 2022:**

13 <https://www.youtube.com/watch?v=pSbVzLby37w> @ 05:26.  
14 Posted a video in which he stated: "I already know your  
15 address; I already know your fucking phone number; I  
16 know your wife's phone number."

17 **February 18, 2022:**

18 E. STIENE, as a *prima facie* tort [PJI 3:7, Vol. 2A  
19 (3d ed.)], threatening the Plaintiff with physical  
20 violence:

21 "jackass comes to my house; I hope they like lead  
22 because I have plenty to offer if that is the case"  
23 01:51

24 <https://www.youtube.com/watch?v=hxsD01DPkDc>  
25  
26

27 74. As a direct result of this outrageous conduct on  
28 Defendant's part, Plaintiff has suffered serious and  
29 continuous psychological trauma. Plaintiff is in fear that  
30 if he ever confronts the Defendant E. STIENE, the Defendant  
31 will, without cause or provocation, seek to harm him, his  
32 wife, and his minor daughter. By publicly posting images of  
33 the Plaintiff's wife and minor daughter, and making no attempt

1 to conceal, obscure or otherwise blur his said minor child,  
2 the Plaintiff fears that that the Defendant, or one of the  
3 many followers of his Youtube®, and other postings will take  
4 it upon themselves to harm his minor child.

5 75. Plaintiff has had creators, publishers, artists, and  
6 customers turn away from Plaintiff LANASA, and Plaintiffs TSR  
7 and DUNGEON HOBBY, stating that they are scared and angry,  
8 vowing not to work with Plaintiff due to the false, fabricated  
9 statements made by Defendant E. STIENE, and his followers.

10 76. According to the posted Youtube® video, which  
11 remains available to this date, 473 individuals have viewed  
12 it, with multiple comments, some of which reference the minor  
13 child.

14 77. These actions caused severe and possibly  
15 irremediable emotional and psychological strain within  
16 Plaintiff LANASA's family by these attacks. A result of which,  
17 has been that the Plaintiff, and his family, have been  
18 compelled to seek outside counseling.

19 78. Plaintiff, and his family members, have had trouble  
20 sleeping, suffer from anxiety, and nervous-ness, and other  
21 trauma due to Defendant's outrageous, and intentional  
22 conduct.

1           79. Such outrageous conduct is further demonstrated by  
2 the fact that Defendant E. STIENE has encouraged others to  
3 distribute the subject content, including the images of the  
4 Plaintiff's minor child, viz.,

5           "You are free to:  
6           "Share – copy and redistribute the material in any  
7           medium or format  
8           "Adapt – remix, transform, and build upon the  
9           material for any purpose, even commercially."

10 June 18, 2022: <https://www.youtube.com/watch?v=hjOSwJd6ZXM>

11           80. The complete disregard for the harm to the Plaintiff  
12 and the outrageous posting of the Plaintiff's minor child is  
13 further demonstrated by the fact that the notice of this was  
14 made to the Defendant at the time of the filing of the  
15 original Complaint in September 2022. See Complaint at ¶ 56.  
16 Yet, now, more than four months later, the Defendant has still  
17 not removed it, nor made any attempt to obscure or otherwise  
18 distort the image of Plaintiff's minor daughter.

19           81. As a result of Defendant's conduct, the Plaintiff is  
20 entitled to compensatory and punitive damages, as well as  
21 injunctive and Declaratory relief.

22           82. That as a result of the foregoing, Plaintiffs have  
23 been damaged in a sum exceeding the jurisdictional limits of  
24 all lower courts that would otherwise have jurisdiction over  
25 this matter, in an amount of no less than \$1,000,000.

**CAUSE OF ACTION FOURTH**

**AS AGAINST DEFENDANTS –**

**PRIMA FACIE TORTIOUS CONDUCT**

83. Plaintiff LANASA repeats, re-iterates, and incorporates herein ¶¶ 1 through 82 as if set forth herein.

83. The Defendants committed *prima facie* tort, as against the Plaintiffs LASNASA, TSR and DUNGEON HOBBY with their (i) intentional infliction of harm; (ii) causing special damages; (iii) without excuse or justification; (iv) by an act or series of acts that would otherwise be lawful.

84. The Defendants, acting in an outrageous, malicious and intentional manner, not only spread defamatory statements harmful to both the Plaintiff LANASA, individually, but also to the named Plaintiffs TSR and DUNGEON HOBBY, as harming their trade. See ¶¶ 24, 75.

85. The Plaintiff LANASA suffered emotional and psychological trauma, as a result of these actions. See ¶¶ 77, 78.

86. The Plaintiffs TSR and DUNGEON HOBBY suffered serious trade and special damages and adverse actions due to the subject postings of the Defendants (see ¶¶ 24, 75), along with irreparable damage within the gaming community.

1           87. In addition, thereto, the postings have resulted in  
2 Plaintiff LANASA expending assets for medical and other  
3 support services such as counseling due to the posting the  
4 picture of the Plaintiff's minor daughter.

5           88. These damages were "special damages", in the sense  
6 that they resulted in a direct pecuniary loss of income and  
7 business. See ¶¶ 24, 75.

8           88. The postings of the named Defendants were  
9 unjustified and inexcusable, as they were solely prompted by  
10 a malevolent desire to harm the Plaintiffs. This is demon-  
11 strated by the posting of a video containing the image of the  
12 Plaintiff LANASA's minor child, without authorization, and  
13 resultant, to be expected, damage to the Plaintiff LANASA and  
14 his family. See ¶¶ 23 thru 27, *supra*.

15           89. Such actions on Defendants' part constituted a  
16 direct and knowing violation of New York Civil Rights L. §§  
17 50, 51, and the Youtube® Terms of Service. See ¶ 27.

18           90. The subject posting of the Plaintiff's minor child  
19 caused further damage and harm to the Plaintiff as it is  
20 recognized that child pornography sites often, through morph-  
21 ing and deep fake technology, sexualize innocent photographs  
22 of minor children – a fact that is well-known to the general  
23 public.

1 See "How innocent photos of children have been exploited  
2 on Twitter," Nat'l Center on Sexual Exploitation (Feb. 2017).  
3 [https://endsexualexploitation.org/articles/article-](https://endsexualexploitation.org/articles/article-innocent-photos-children-exploited-twitter/)  
4 [innocent-photos-children-exploited-twitter/](https://endsexualexploitation.org/articles/article-innocent-photos-children-exploited-twitter/)

5 91. Such postings would otherwise be lawful and  
6 justified, in the absence of such outrageous conduct, and if  
7 done with the requisite permission, that was never granted.

8 92. Such postings include, but are not limited to:

9 E. STIENE, as a *prima facie* tort, threatening the  
10 Plaintiff with physical violence:

11 "jackass comes to my house; I hope they like lead  
12 because I have plenty to offer if that is the case"  
13 01:51

14  
15 <https://www.youtube.com/watch?v=hxsD0lDPkDc>  
16

17 **March 17, 2022:**

18 E. STEINE asserting Plaintiff LANASA of engaging in  
19 violent sexual conduct demonstrating actionable  
20 malice on Defendant E. STIENE's part:

21 "Mario77 [a name that the Defendant ascribed to  
22 Plaintiff LANASA], aka ignorant cunt, aka Justin I  
23 fuck ignorant cocks; we know this is Justin" 0:28  
24

25 Accusing Plaintiff LANASA of doxing, searching for  
26 and publish private or identifying information  
27 about a particular individual on the internet, with  
28 malicious intent to harm the Plaintiff, as *prima*  
29 *facie* tort:

30 "You doxed me, you little shit." 03:09  
31

32 E. STIENE making violent sexual misconduct state-  
33 ments as to the Plaintiff LANASA, as *prima facie*  
34 tort:

35 "my wife just told you that she would grow a cock  
36 so you could eat that cock" 09:31  
37

1 <https://www.youtube.com/watch?v=pSbVzLby37w>

2  
3 Defendant E. STIENE, joined by Defendant ~~E.~~ STIENE,  
4 engaging in *prima facie* tort, posted a video in which he  
5 stated: "Here's the thing Justin. I already know your  
6 address; I already know your fucking phone number; I  
7 know your wife's phone number."

8 <https://www.youtube.com/watch?v=pSbVzLby37w> @ 05:26.

9 93. As a result of Defendant's conduct, the Plaintiff is  
10 entitled to compensatory and punitive damages, as well as  
11 injunctive and Declaratory relief.

12 94. That as a result of the foregoing, Plaintiffs have  
13 been damaged in a sum exceeding the jurisdictional limits of  
14 all lower courts that would otherwise have jurisdiction over  
15 this matter, in an amount of no less than \$1,000,000.

16 WHEREFORE, Plaintiffs demand judgment against the Defendant,  
17 as follows:

18 a. On the First Cause of Action, damages in an amount  
19 exceeding the jurisdictional limits of all lower  
20 courts that would otherwise have jurisdiction over  
21 this matter, in an amount of no less than \$1,000,000;

22 b. On the Second Cause of Action, damages in an amount  
23 exceeding the jurisdictional limits of all lower  
24 courts that would otherwise have jurisdiction over  
25 this matter, in an amount of no less than \$1,000,000;

- 1 c. On the Third Cause of Action, damages in an amount  
2 exceeding the jurisdictional limits of all lower  
3 courts that would otherwise have jurisdiction over  
4 this matter, in an amount of no less than \$1,000,000;
- 5 d. On the Fourth Cause of Action, damages in an amount  
6 exceeding the jurisdictional limits of all lower  
7 courts that would otherwise have jurisdiction over  
8 this matter, in an amount of no less than \$1,000,000;
- 9 e. An Order from this Court permanently enjoining the  
10 Defendant from posting anything on any social media  
11 platform, private or public, making any statement or  
12 reference to the named Plaintiffs herein;
- 13 f. The issuance of a public retraction of all defamatory,  
14 libelous and false claims;
- 15 g. Interest, costs, and disbursements of this action;
- 16 h. Punitive damages, in an amount to be determined at  
17 trial;
- 18 i. Both Pre-judgement and Post-Judgment Interest at the  
19 statutory rate;
- 20 j. For all legal fees and costs and disbursements of this  
21 Action; and
- 22 k. For such other further relief as this Court shall deem  
23 just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury on all issues.

F.R.Civ.P. Rule 38.

Dated: January 17, 2023  
Somers, NY



Bernard V. Kleinman, Esq.

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~~LOIS STIENE~~

~~5209 Haspel Street~~

~~# 2~~

~~Elmhurst, NY 11373-4344~~

VERIFICATION


STATE OF NORTH CAROLINA  
COUNTY OF NEW HANOVER } S.S.:

I am JUSTIN LANASA, the named Plaintiff herein, and a principal in the named Plaintiffs TSR, LLC, and DUNGEON HOBBY SHOP MUSEUM, LLC:

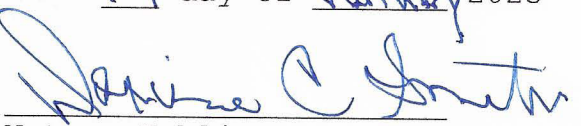
I have read the foregoing Verified Complaint and know the contents thereof. I know the same is true to my own knowledge, except as to matters based upon information and belief, and to those matters I believe them to be true.

  
JUSTIN LANASA

  
TSR, LLC  
By: Justin Lanasa

  
DUNGEON HOBBY SHOP MUSEUM, LLC  
By: Justin Lanasa

Sworn to Before Me  
this 17 day of January 2023

  
Notary Public  
State of North Carolina

